



KENAI PENINSULA BOROUGH

Coastal Management Program

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**JOHN J. WILLIAMS
BOROUGH MAYOR**

November 13, 2006

Mr. Ben A. Greene, Oil, Gas and Energy Projects Manager
DNR, Office of Project Management and Permitting
550 West 7th Avenue, Suite 1660
Anchorage, Alaska 99501

Subject: ConocoPhillips Beluga River Seismic Survey, AK2006-0906 OG

Dear Mr. Green:

Kenai Peninsula Borough (KPB) Coastal District staff reviewed the above referenced project for consistency with KPB Coastal Management Program (KPBCMP) enforceable policies. This project seeks a consistency determination for the conduct of 3D-seismic surveys within the onshore/offshore transition zone of the Beluga River area of Cook Inlet, in Township 12N-14N, Range 11W-9W, Seward Meridian.

Project Description

The applicant's seismic survey project will occur on lands managed by the Kenai Peninsula Borough, the State of Alaska and on lands in Native and private ownership. The time period during which activity will occur is January 1, 2007 to May 15, 2007.

The applicant's Beluga 3D-Seismic Program, 2006-2007 Plan of Operations calls for transition zone seismic surveys to be conducted concurrently on both onshore and offshore areas. Mulchers, using flail-type blade systems, will be used to clear alder and spruce from seismic line 3.5 to 4 meters in widths. The top mat of soil will not be disturbed. Mulchers will be mounted on tracked machines exerting pressure on the mat from 3 to 5 pounds per square inch. The mulchers will be operated to avoid older-growth spruce and alders, clearing brush and small trees in a manner that does not leave long stretches of visible cut lines. Mulchers will maintain required set-backs from roads, streams and drainages. Drilling holes will be accomplished with track drills and/or heliportable drills, creating holes 3 inches in diameter to a depth of 25 feet. Explosives will be 5-pounds of cast primer cut to fit detonation system. Drilled holes will be backfilled with excavated material. The applicant will store a maximum of 3,000 gallons of fuel onshore and will maintain a spill containment area with capacity to handle 155% of stored fuel.

Offshore activities will involve two primary vessels and three to four support vessels. The electronic navigation system will include a hazard display system that can report operational hazards such as buoys. The source for acquisition will be a 900 CUI Bolt air gun array on the source vessel. Acquisition will be limited to 1-2 hours during slack tides. The applicant has sought authorization from the National Marine Fisheries Service for conduct of seismic activity. Marine mammal monitors will be used.

The schedule for activities proposed by the applicant calls for survey and mulching December 2006 – January 2007; drilling operations in January – February 2007; data acquisition and marine operations from March 15 to May 15. Demobilization in May 2007.

Findings

Activities outside the scope of this review are Temporary Water Use Permits, issuance of U.S. Army Corps of Engineers permits authorizing survey activities in waters of the U.S., and Air, Land and Water Quality standards.

The applicant's proposed mitigation measures found in its Plan of Operations serves to satisfy the KPBCMP enforceable policy, 2.6 Mitigation, regarding land and water uses that may adversely impact fish and wildlife populations and habitats. The applicant's proposed activity onshore satisfies KPBCMP enforceable policy 5.4, Habitat Protection, provided the activities are limited to the minimum area necessary for the project.

Kenai Peninsula Borough Coastal Management Program (KPBCMP) enforceable policy 12.9, Whale Migration and Feeding Areas, requires activities within or adjacent to coastal waters to avoid interference with migration or feeding of whales. Interference refers to conduct or activities that disrupt an animal's normal behavior or cause a significant change in the activity of the affected animal. The applicant plans to utilize marine mammal monitors and "several other voluntary mitigation measures". As an alternative measure, the applicant should publish its marine mammal mitigation measures in full prior to commencing offshore activity.

Thank you for the opportunity to comment.

Sincerely,



Gary Williams
Coastal District Coordinator